

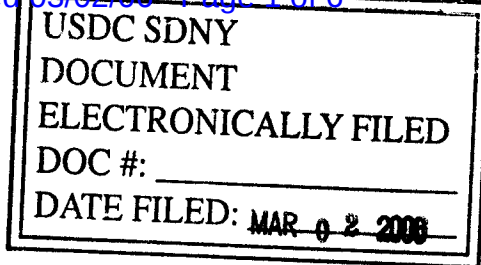
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JOSE VASQUEZ,
ARNALDO CABRERA,
a/k/a "Tony," and
MILKA SALGUERO,

Defendants.



SEALED
INDICTMENT

S1 05 Cr. 1278 (NRB)

COUNT ONE

The Grand Jury charges:

1. From in or about 1998 through in or about January 2006, in the Southern District of New York and elsewhere, JOSE VASQUEZ, ARNALDO CABRERA, a/k/a "Tony," and MILKA SALGUERO, the defendants, and others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JOSE VASQUEZ, ARNALDO CABRERA, a/k/a "Tony," and MILKA SALGUERO, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, 5 kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Sections 812, 841(a)(1) and 841(b)(1)(A) of Title 21, United States Code.

OVERT ACTS

3. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about 1998, a co-conspirator not named as a defendant herein distributed approximately 8 kilograms of cocaine in New York, New York.

b. In or about 2000, JOSE VASQUEZ, ARNALDO CABRERA, a/k/a "Tony," and MILKA SALGUERO, the defendants, coordinated the importation of approximately four shipments of cocaine totaling over 500 kilograms into Newark International Airport.

c. In or about May 2005, ARNALDO CABRERA, a/k/a "Tony," the defendant, placed a telephone call to New York, New York in order to arrange for the distribution of multiple kilograms of cocaine.

d. In or about May 2005, JOSE VASQUEZ, ARNALDO CABRERA, a/k/a "Tony," and MILKA SALGUERO, the defendants, coordinated the importation of approximately 409 kilograms of cocaine into Newark International Airport.

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

4. From in or about 1998 through in or about January

2006, in the Southern District of New York and elsewhere, JOSE VASQUEZ, ARNALDO CABRERA, a/k/a "Tony," and MILKA SALGUERO, the defendants, and others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

5. It was a part and an object of the conspiracy that JOSE VASQUEZ, ARNALDO CABRERA, a/k/a "Tony," and MILKA SALGUERO, the defendants, and others known and unknown, would and did import into the United States from a place outside thereof a controlled substance, to wit, five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Sections 952, 960(a)(1) and 960(b)(1)(B) of Title 21 of the United States Code.

OVERT ACTS

6. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts were committed in the Southern District of New York and elsewhere:

a. In or about 1998, a co-conspirator not named as a defendant herein distributed approximately 8 kilograms of cocaine in New York, New York.

b. In or about 2000, JOSE VASQUEZ, ARNALDO CABRERA, a/k/a "Tony," and MILKA SALGUERO, the defendants, coordinated the importation of approximately four shipments of cocaine totaling over 500 kilograms into Newark International

Airport.

c. In or about May 2005, ARNALDO CABRERA, a/k/a "Tony," the defendant, placed a telephone call to New York, New York in order to arrange for the distribution of multiple kilograms of cocaine.

d. In or about May 2005, JOSE VASQUEZ, ARNALDO CABRERA, a/k/a "Tony," and MILKA SALGUERO, the defendants, coordinated the importation of approximately 409 kilograms of cocaine into Newark International Airport.

(Title 21, United States Code, Section 963.)

FORFEITURE ALLEGATION

7. As a result of committing the controlled substance offenses alleged in Counts One and Two of this Indictment, JOSE VASQUEZ, ARNALDO CABRERA, a/k/a "Tony," and MILKA SALGUERO, the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendants obtained directly or indirectly as a result of said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts One and Two of this Indictment, representing the amount of proceeds obtained as a result of the controlled substance offenses for which the defendants are liable.

Substitute Assets Provision

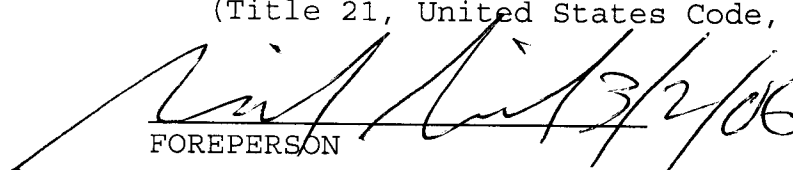
8. If any of the property described above as being


subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1) and 853.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JOSE VASQUEZ,
ARNALDO CABRERA,
a/k/a "Tony," and
MILKA SALGUERO

Defendants.

INDICTMENT

S1 05 Cr. 1278 (NRB)

(Title 21, United States Code,
Sections 846, 963)

MICHAEL J. GARCIA
United States Attorney

A TRUE BILL.

Foreperson.

(Sealed) 3/2/06
3/2/06 - Fld. Superseding Indictment
S'05 Cr. 1278 (NRB).

J. Eaton, Jr. U.S. M. J.